



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

September 10, 2008

Anna Burger, Treasurer
Service Employees International Union Committee
on Political Education (SEIU COPE)
1800 Massachusetts Ave NW
Washington, DC 20036

Response Due Date:
October 10, 2008

Identification Number: C00004036

Reference: May Monthly Report (4/1/08-4/30/08)

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. **Failure to adequately respond by the response date noted above could result in an audit or enforcement action.** Additional information is needed for the following 5 items:

1. The total listed on Line 11(a)(iii), Column B of the Detailed Summary Page appears to be incorrect. Please be advised that you should add the "Calendar Year-to-Date" total from your previous report to the current "Total This Period" figure from Column A to derive the correct Column B total. Please amend your report and any subsequent reports that may be affected by this correction.
2. The totals listed on Lines 11(a)(i) and 11(a)(ii), Column B of the Detailed Summary Page appear to be incorrect. Please be advised that you should add the "Calendar Year-to-Date" total from your previous report to the current "Total This Period" figure from Column A to derive the correct Column B totals. When an individual's aggregate exceeds the \$200 threshold, the amount should not be deducted from the Column B figure for Line 11(a)(ii). Please amend your report and any subsequent reports that may be affected by this correction.
3. The independent expenditure schedule (Schedule E) should disclose the following information: the name and mailing address of the payee, the purpose of the expenditure, the date of payment, the amount of payment, the name and office sought, state and district (if applicable) of the federal

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candidate, the calendar year-to-date, per election, for office sought total, the election designation, an indication of whether the candidate was supported or opposed and the signature of the treasurer. Please amend Schedule E by providing the election designation. 11 CFR §104.3(b)(3)(vii)

4. Schedule B discloses an expenditure(s) for "Database Polling Services" and "Fundraising Calls." If a portion or all of these expenditures were for public communications (as defined by 11 CFR §100.26) or voter drive activity (under 11 CFR §106.6(b)(2)(i)) containing express advocacy as defined under 11 CFR §100.22, this would constitute an in-kind contribution or an independent expenditure and should be properly disclosed on a Schedule B or E supporting Line 23 or 24 as appropriate. Public communications and voter drive activity that refer to a clearly identified Federal candidate, but that do not expressly advocate the election or defeat of that candidate should be reported on Schedule B for Line 21(b) of the Detailed Summary Page. Please clarify whether this activity contained express advocacy and amend your report to properly disclose this activity, if necessary.

5. Schedule B supporting Line 29 discloses that your committee made a \$4,000 contribution to "North Carolina Democratic Party." A review of reports filed by the North Carolina Democratic Party - Federal discloses the receipt of \$4,000 from your committee (pertinent portion(s) attached). Please confirm that the full amount of \$4,000 was actually contributed to their federal account or provide additional clarifying information.

In the event a contribution was made to the North Carolina Democratic Party - Federal, please amend your report to disclose it on Schedule B supporting Line 23 of the Detailed Summary Page. Line 29 is to be used when making contributions to non-federal candidates and committees.

Please note, you will not receive an additional notice from the Commission on this matter. Adequate responses must be received by the Commission on or before the due date noted above to be taken into consideration in determining whether audit action will be initiated. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action. **Requests for extensions of time in which to respond will not be considered.**

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather

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than just those portions of the report that are being amended. If you should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1152.

Sincerely,

Rosa G. Lewis

Rosa G. Lewis
Senior Campaign Finance Analyst
Reports Analysis Division

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SCHEDULE A (FEC Form 3X)
ITEMIZED RECEIPTS

 Use separate schedule(s)
 for each category of the
 Detailed Summary Page

 FOR LINE NUMBER: **PAGE 45/111**
 (check only one)
☐ 11a ☐ 11b ☐ 11c ☐ 12
☐ 13 ☐ 14 ☐ 15 ☐ 16 ☐ 17

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

 NAME OF COMMITTEE (in Full)
 North Carolina Democratic Party - Federal

A. Full Name (Last, First, Middle Initial) Jim Neal for Senate Mailing Address P.O. Box 597 City State Zip Code Chapel Hill NC 27514 FEC ID number of contributing federal political committee: C Name of Employer Occupation Receipt For: Primary General Other (specify) ▼ Aggregate Year-to-Date ▼ 975.00	Date of Receipt 05 01 2008 Transaction ID: 11c-000033840 Amount of Each Receipt this Period 125.00 Transfer
B. Full Name (Last, First, Middle Initial) SEIU Cape Fund PAC Mailing Address 1313 L Street, NW City State Zip Code Washington DC 20005 FEC ID number of contributing federal political committee: C Name of Employer Occupation Receipt For: Primary General Other (specify) ▼ Aggregate Year-to-Date ▼ 4000.00	Date of Receipt 05 01 2008 Transaction ID: 11c-000033841 Amount of Each Receipt this Period 4000.00
C. Full Name (Last, First, Middle Initial) Jim Neal for Senate Mailing Address P.O. Box 597 City State Zip Code Chapel Hill NC 27514 FEC ID number of contributing federal political committee: C Name of Employer Occupation Receipt For: Primary General Other (specify) ▼ Aggregate Year-to-Date ▼ 400.00	Date of Receipt 05 05 2008 Transaction ID: 11c-000033849 Amount of Each Receipt this Period 25.00 Transfer

SUBTOTAL of Receipts This Page (optional)	4150.00
TOTAL This Period (last page this line number only)	

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FEC Schedule A (Form 3X) (Revised 02/2008)

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